

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SUPER 8 MOTELS, INC.)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:06-cv-206-DRB
)	
JALA INVESTMENTS, INC., HIMAT, INC., CHANDRAKANT PATEL, and DHIRAJLAL PATEL))))	
Defendants.)	

MOTION FOR EXTENSION OF DEADLINE FOR FILING RESPONSIVE PLEADING

COME NOW Defendants Himat, Inc., (Himat), Chandrakant Patel, and Dhirajlal Patel (collectively “the Patels”) and move this Court for an extension of ten days in which to file a pleading in response to the Complaint in this action. As grounds for same, Himat and the Patels show as follows:

- (1) Himat and the Patels have contacted Plaintiff’s counsel and Plaintiff’s counsel has no objection to the ten-day extension.
- (2) The extension will permit Himat and the Patels to explore the matter further and respond more accurately to the claims pled.
- (3) No party will be prejudiced by the requested extension.

WHEREFORE, Himat and the Patels pray this Court will grant a ten-day extension in which to file a responsive pleading.

Respectfully Submitted,

/s/ Shannon L. Holliday
Shannon Holliday (HOL088)
COPELAND, FRANCO, SCREWS & GILL,
P.A.
P.O. Box 347
Montgomery, AL 36101-0347
Telephone: 334-834-1180
Facsimile: 334-834-3172

CERTIFICATE OF SERVICE

I hereby certify that on April 25th, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Perry Garnett Jackson**
perrygjackson@hotmail.com perrygjackson@yahoo.com
- **Robin Garrett Laurie**
rlaurie@balch.com dearly@balch.com
- **Kelly Fitzgerald Pate**
kpate@balch.com kpowell@balch.com

/s/ Shannon L. Holliday
Of Counsel